

**ABATE & PREUSS
ATTORNEYS AT LAW**

333 Park Avenue South, Suite 3A, New York, NY 10010
TEL: (212) 227-9003 • FAX: (212) 937-2112

December 2, 2024

VIA ECF

The Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/5/2024
--

**Re: Request for Bail Modification Expanding Travel to the District of New Jersey
United States v. Delilah Carriel, 21 Cr. 00093 (VM)**

Dear Judge Marrero:

Delilah Carriel is currently on pretrial release subject to certain conditions including travel restricted to SDNY/EDNY.¹ For the following reasons, I respectfully request that the travel restriction be modified to include the District of New Jersey.

Ms. Carriel has worked for several years as a “floating” Office Administrator at ENT and Allergy Associates, a collection of doctors’ offices under a corporate umbrella. Her employment role is to support the doctors at various offices by assisting with billing and insurance matters, providing office management when necessary, and training the staff at each office whenever software changes or updates occur. She has worked primarily with doctors’ offices in Manhattan and Westchester. Now, however, ENT and Allergy Associates has merged with several medical practices in the State of New Jersey. For the merger, these offices must transition to ENT’s software and procedures, and their staff trained on the new programs.

This is work Ms. Carriel is required to perform. I have received a letter from the Company informing me that they need her to be in New Jersey to assist in the transition. Specifically, during the month of January 2025, “all float staff will be required to remain in the New Jersey area from Sunday through Friday nights. The designated hotel accommodations are ... Westin Mount Laurel, 222 Fellowship Road, Mount Laurel, NJ.” See Letter from Regional Operations Manager Charlene Galletti, attached as Exhibit A. The letter lists eleven doctors’ offices out of which float staff will be working, although assignments are not yet finalized.

Because of this employment circumstance, I respectfully request that Ms. Carriel’s travel area be expanded to include the District of New Jersey. I have spoken to Pretrial Services Officer

¹ The other conditions of bail include surrender travel documents and no new applications, pretrial supervision as directed by Pretrial Services, continue or seek employment, and defendant not to possess firearm or other weapon. Location monitoring was removed as a bail condition on August 21, 2024.

Shannon Finneran, who has no objection to amending the conditions of release to include the District of New Jersey for work purposes. AUSA Thomas Wright has stated that “[p]rovided that the requested modification of the conditions of pretrial release is limited to employment-related travel for ENT & Allergy Associates in the District of New Jersey, the Government takes no position on the request.”

Thank you for your consideration of this matter.

Sincerely,

Camille M. Abate

Camille M. Abate, Esq.

cc: Thomas Wright, Esq. (via ECF)
Michael Herman, Esq. (via ECF)

Defendant's request is GRANTED. Ms. Carriel's travel area is expanded to include the District of New Jersey provided that any travel therein is limited to employment-related travel for ENT & Allergy Associates in the District of New Jersey.

SO ORDERED.

12/5/2024

DATE


VICTOR MARRERO, U.S.D.J.

November 12, 2024

To Whom It May Concern,

I am writing to inform you that Delilah Carriel Diaz is currently employed by ENT and Allergy Associates. As part of our ongoing merger, which is scheduled to go live on January 2, 2025, all our float staff, including Ms. Diaz, are required to participate in this transition. This will involve departing on the evening of January 1, 2025, to begin early on January 2nd.

During the month of January, all float staff will be required to remain in the New Jersey area from Sunday through Friday nights. The designated hotel accommodations are as followed:

Westin Mount Laurel
222 Fellowship Road
Mount Laurel, NJ

The offices where our staff will be working are located at the following addresses:

- 130 North Haddon Ave, Haddonfield, NJ
- 213 North Haddon Ave, Haddonfield, NJ
- 103 Old Marlton Pike, Medford, NJ
- 127 Ark Rd, Mount Laurel, NJ
- 204 Ark Rd, Mount Laurel, NJ
- 239 Hurffville-Crosskeys Road, Sewell, NJ
- 200 Bowman Drive, Voorhees, NJ
- 1000 White Horse Road, Voorhees, NJ
- 600 Jessup Rd, West Deptford, NJ
- 113 Hospital Drive, Willingboro, NJ
- 620 North Broad Street, Woodbury, NJ

At this time, specific office assignments have not been finalized, and I am providing all possible locations for your reference.

If you have any questions or require further information, please feel free to contact me directly at 347-538-1506.

Thank you for your attention to this matter.

Best regards,
Charlene Galletti
Regional Operations Manager
347-538-1506